

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

v.

MILAN JURKOVIC,  
Defendant.

NO. CR23-001 RSL

**PROTECTIVE ORDER**

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant Milan Jurkovic, and the Court, having considered the stipulated motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following are deemed Protected Material: child forensic interview of Minor Victim 1. The United States will make available copies of the Protected Material, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Material is limited to the attorneys of record, and investigators, paralegals, law clerks, experts, and assistants for

1 the attorney of record (hereinafter collectively referred to as members of the defense  
2 team).

3 2. Scope of Review of Protected Material

4 Defense attorney of record and members of the defense team may display and  
5 review the Protected Material with the Defendant. The attorneys of record and members  
6 of the defense team acknowledge that providing copies of the Protected Material to the  
7 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of  
8 Protected Material to the Defendant and other persons.

9 3. Consent to Terms of Protective Order

10 The attorney of record for the Defendant is required, prior to disseminating any  
11 copies of the Protected Material to permitted recipients, such as other members of the  
12 defense team, to provide a copy of this Protective Order to those permitted recipients, and  
13 to obtain the written consent by those recipients of the terms and conditions of this  
14 Protective Order. Such written consent shall not, however, be required with respect to  
15 members of the defense team who are employed by the same office as the attorneys of  
16 record; in such case, it shall be sufficient for the attorneys of record to provide a copy of  
17 this Protective Order to such other members of the defense team and to remind them of  
18 their obligations under the Order. The written consent need not be disclosed or produced  
19 to the United States unless requested by the United States Attorney's Office for the  
20 Western District of Washington and ordered by the Court.

21 4. Parties' Reciprocal Discovery Obligations

22 Nothing in this order should be construed as imposing any discovery obligations  
23 on the government or the defendant that are different from those imposed by case law and  
24 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

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